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VIA ECF

The Honorable Paul W. Grimm
Marie.Worden@mdd.uscourts.gov
U.S. District Court for the District of Maryland
6500 Cherrywood Lane, Suite 465A
Greenbelt, Maryland 20770

Re: *Hicks v. Ferreyra, et al., Case No. 16-cv-02521-PWG*
U.S. District Court for the District of Maryland

Dear Judge Grimm,

We write to respectfully request the Court's assistance in obtaining the attendance at trial in this case of United States Park Police Lieutenant Timothy F. Wallace, who, in 2015, was the direct supervisor of Defendants and a material eyewitness to the 2015 events at the heart of this lawsuit.

As the Court may be aware, Plaintiff requested that the United States Park Police and its parent department, the Department of the Interior, make Lt. Wallace available to testify at trial pursuant to *United States ex rel. Touhy v. Ragen*, 340 U.S. 462 (1951) and its enabling regulations, which request Defendants join.

Despite this, Defendants learned today that Lt. Wallace's employer cannot confirm that Lt. Wallace will attend and be available to testify on any of the currently scheduled trial days this week. As Your Honor previously indicated that the Court may intercede in the event that the parties were unable to compel the presence of essential witnesses using ordinary process, Defendants respectfully request that the Court issue an appropriate order directing that the United States Park Police and/or the Department of the Interior take all necessary measures to ensure that Lt. Wallace attends and is available to testify on at least one of the currently scheduled trial dates.

Respectfully,

/s/
Edward P. Parent, Esq.

cc: Jia M. Cobb, Esq. (via electronic mail)